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ENFORCEMENT CASE SDWA 1431  
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107-11 CIVIL LAW DEPOSITION  
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East Poplar Oil Field  
Enforcement Case

DEPOSITION - ABIGAIL RED

Region 8



13606

COPY

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BILLINGS DIVISION

CARY G. YOUPEE, et al.,

Plaintiffs,

vs.

MURPHY OIL USA, INC., et al.,

Defendants.

Cause No. CV 98-108-BLG-JDS

Judge Jack D. Shanstrom

MESA PETROLEUM and PIONEER  
NATURAL RESOURCES, USA, INC.,

Defendants/  
Third Party Plaintiffs &  
Cross Plaintiffs,

vs.

AMARCO RESOURCES CORP.  
BESTWAY INC.; WESTDALE  
PETROLEUM INC.; and THE  
PRUDENTIAL GROUP,

Third Party Defendants,

vs.

JOHN DOES 4-50,

Cross-Defendants.

DEPOSITION

OF

ABIGAIL REDDOOR

TIME: Tuesday, June 12, 2001 at 12:34 p.m.

PLACE: Sherman Motor Inn, 200 East Main, Wolf Point, MT

Joann D. Hesel  
Official Court Reporter  
Fifteenth Judicial District  
Roosevelt County Courthouse  
Wolf Point, Montana 59201  
Ph. (406) 653-6272  
Home: (406) 525-3712

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Irma Reddoor

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1 BE IT REMEMBERED: That the oral deposition of ABIGAIL  
2 REDDOOR was taken at 12:34 p.m. on the 12th day of June,  
3 2001 at the Sherman Motor Inn, 200 East Main, Wolf Point,  
4 Montana, with the appearances of counsel hereinbefore  
5 noted, before Joann D. Heser, Official Court Reporter and  
6 Notary Public for the State of Montana.

7 The following proceedings were had:

8 -----

9 Whereupon,

10 ABIGAIL REDDOOR,

11 called for examination, and being first duly sworn upon her  
12 oath, testified as follows:

13 EXAMINATION BY MR. STERUP:

14 Q Will you state your name for the record?

15 A Abigail Yvonne Reddoor.

16 Q My name is Rob Sterup. I'm representing Samson  
17 Hydrocarbons. Have you ever been to a deposition before?

18 A No.

19 Q Has the process been explained to you?

20 A Yes.

21 Q We will be asking questions as you know, and your  
22 answers will be recorded and later transcribed, so it's  
23 important that you respond audibly so the answers can be  
24 taken down and also important that you wait until I finish  
25 the question before beginning your answers. What is your  
26 occupation or employment?

27 A I'm a teacher at Poplar Public School.

28

1 Q What do you teach?

2 A Dakota language.

3 Q How long have you had that employment?

4 A Six years.

5 Q What employment did you have before that?

6 A Um, medical transcriber, medical secretary,  
7 medical technician for Public Health Service.

8 Q How long did you work for the Public Health  
9 Service?

10 A Seventeen years.

11 Q What is your educational background?

12 A I have an Associate of Arts degree in business  
13 administration.

14 Q What college or university did you attend?

15 A I went to Fort Peck Community College, Poplar,  
16 Montana.

17 Q Where are you from originally?

18 A Poplar, Montana.

19 Q What is your age and date of birth?

20 A My age 63, my birthdate 9/26/37.

21 Q Have you ever lived outside the Poplar area for  
22 any significant period of time?

23 A Yes, I lived in San Jose, California, in -- I  
24 moved there in 1967, and I was there for seven years. I  
25 lived in Albuquerque, New Mexico, for four years. And I've  
26 been in Poplar the rest.

27 Q What years did you live in Albuquerque?

28

1 A In 1990 through '94.

2 Q What is your relationship to Irma Reddoor?

3 A Irma Reddoor is my sister.

4 Q Are you related to any of the other plaintiffs in  
5 this litigation?

6 A No.

7 Q How long has your family lived in the Poplar area?

8 A My family? Lifetime.

9 Q So your parents were from Poplar and their parents  
10 before them, going back quite a ways, I take it?

11 A Um-hm. (Indicates yes.)

12 Q One of the exhibits that you should have in front  
13 of you is a large map. The information that I have  
14 indicates that the property that we're concerned with today  
15 is one that has a water well on it denominated M18. Can  
16 you find M18 on the large map which I believe is Exhibit  
17 No. 1? Have you been able to locate that on the Exhibit?

18 A Yes.

19 Q The property surrounding M18, when did you first  
20 acquire any interest in that particular property, in what  
21 year?

22 A The property that I lived on? Okay. I was given  
23 this land by my grandfather in a will, and I moved a house  
24 on that property in, I believe, 19 -----

25 (A BRIEF INTERRUPTION.)

26 Q (By Mr. Sterup) Let's go back on the record. We  
27 had a brief unexpected interruption there. You were saying

28

1 that you inherited the property from your grandfather?

2 A (By Deponent) My grandfather, Basil Reddoor.

3 Q And do you recall about when you inherited the  
4 property?

5 A Well, I found out about it in 1973, and then I  
6 bought a house in Scobey, Montana, and I had it moved onto  
7 that property.

8 Q The information I have indicates that you had  
9 about twelve acres at that particular site. Is that an  
10 accurate account?

11 A Yes.

12 Q And, apparently, you learned of your inheritance  
13 of that acreage in about 1973?

14 A Um-hm. (Indicates yes.)

15 Q And one of the things you need to do is to speak  
16 up audibly with your answers, a yes or a no. And about  
17 when did you then move onto that property?

18 A 1976.

19 Q And at that time, apparently, you caused a house  
20 to be moved onto the property?

21 A Yes.

22 Q Who was living with you at that time?

23 A My family.

24 Q Who was in your family?

25 A My husband, my two daughters and one son.

26 Q What were their names?

27 A My oldest daughter is Lanette Ryan. My second  
28

1 daughter is Gina Ryan. My son, Eugene Ryan, Jr.

2 Q How long did you continue to live on that  
3 property?

4 A I believe in 1981 I moved into town into  
5 government housing because my children were all involved in  
6 sports.

7 Q How old were your children at that time?

8 A They were all in high school, 15, 17, 18.

9 Q And, I take it, as children tend to do these days,  
10 they had a pretty full schedule with the sports and other  
11 activities?

12 A Yes.

13 Q And to accommodate that, you thought it would be  
14 better to live in town rather than out in the country?

15 A Yes.

16 Q And as far as you can recollect, that was about  
17 1981?

18 A Yes.

19 Q And where did you move in Poplar, at what  
20 location?

21 A Government housing. It was located a block south  
22 of the Indian Health Center.

23 Q How long did you stay at that particular  
24 residence?

25 A Approximately two years.

26 Q Where did you go at that point?

27 A I believe I moved back out to the country.  
28

1 Q So that puts us up to about 1983 when you moved  
2 back out to the country, is that accurate?

3 A Yes, um-hm.

4 Q Had anyone occupied the house in the country  
5 during that two year period about 1981 to about 1983?

6 A We went back out to the house off and on, stay out  
7 there on weekends and so forth.

8 Q So your primary residence was in town, but you  
9 continued to go back out to the country from time to time?  
10 Is that accurate?

11 A Um-hm. Yes, it is.

12 Q And then after moving back out to the country in  
13 1983, how long did you continue to maintain that residence?

14 A No, it was 1985 -- up until 1985 I was in town.

15 Q So you moved into town to accommodate your kids'  
16 schedules in about 1981 and you stayed in town until about  
17 1985?

18 A Yeah. Yes, that's when my son graduated from high  
19 school.

20 Q And at that point, 1985, your children had all  
21 left school, I take it?

22 A Yes.

23 Q And at that point, did you and your husband move  
24 back out to the country or did you go somewhere else?

25 A I moved back out to the country.

26 Q And in 1985 after having moved back out to the  
27 country, how long did you stay at that residence before you  
28

1 moved somewhere else?

2 A Up until, I believe, 1990, because I was going to  
3 community college at the time.

4 Q So between 1985 and 1990, you were attending  
5 community college?

6 A I graduated there in, must have been '87--'88. I  
7 don't remember exactly?

8 Q And then in 1990, where did you move?

9 A From there, I moved to Albuquerque, New Mexico.

10 Q How does it happen you moved to Albuquerque in  
11 1990?

12 A I was trying to find a way to get our Dakota hymns  
13 translated and recorded, and so I moved to Albuquerque and  
14 accomplished that through the University of New Mexico.

15 Q Did you have employment at the University?

16 A No, I didn't. I was employed by Lovelace Medical  
17 Center as a medical transcriptionist all during the time I  
18 was there.

19 Q But it sounds like the primary driving force  
20 behind the move to Albuquerque was your desire to work at  
21 the University on translating the hymns?

22 A I didn't think it would take four years, but it  
23 did.

24 Q I'm just curious. What resource do they have at  
25 the University that aided you in that project?

26 A It was set up through our Presbyterian Church that  
27 we attended there. They belong to the Presbyterian Church  
28

1 that we attended, the person that worked in the music  
2 department; and so it didn't cost us a thing in money at  
3 all to get those hymns recorded. And there was an  
4 agreement that when we accomplished this, they would have  
5 the master copy of the music.

6 Q Is the language that you teach, Lakota or Dakota?

7 A Dakota.

8 Q How did you learn the Dakota language?

9 A I can't tell you that exactly because when I lived  
10 in South Dakota I was five years old and that's where I  
11 knew the language, playing with the kids. I just know.

12 Q Have you continued to use it throughout your adult  
13 life?

14 A Yes.

15 Q What percentage of the Fort Peck Tribe is fluent  
16 in Dakota, a large or small percentage?

17 A Small percentage. There are only about, oh,  
18 approximately 60 fluent speakers.

19 Q The move to Albuquerque for the purpose of  
20 translating the hymns in 1990, it took a bit longer than  
21 you anticipated. When did you then move back to the Poplar  
22 area?

23 A June 1994.

24 Q Have any of your children lived with you in your  
25 home since they graduated from high school in the late  
26 1980's? Have they all been out on their own?

27 A They've all been on their own.  
28

1 Q Since moving back to Poplar from Albuquerque,  
2 where have you lived?

3 A First year I came back, I lived here in Wolf Point  
4 for a year, commuted to work in Poplar; and then I moved  
5 back into Poplar and lived in city housing for, I believe,  
6 three years -- three, four years -- three years, I believe.  
7 And now I reside with my daughter in Fort Peck Housing.

8 Q What became of the house that you had moved out to  
9 the country location?

10 A It's still there.

11 Q Has it been occupied since you moved to  
12 Albuquerque in 1990?

13 A I rented it to some people for one year, but they  
14 didn't take care of it so I don't rent it to anybody.

15 Q Who were those folks?

16 A She was a registered nurse at the community  
17 hospital, but I don't recall her name.

18 Q And when you say they didn't take care of it, I  
19 take it you mean simple upkeep and maintenance and that  
20 sort of thing?

21 A Yes.

22 Q So since they left in about 1991, the house has  
23 been there but it's not been occupied or rented to anyone?

24 A Yes.

25 Q Is that accurate?

26 A That's right.

27 Q So just so I understand correctly, the first time  
28

1 you moved off of the country away from the country house  
2 into town, it was because of your kids' school activities;  
3 and the second time you moved off was to go to Albuquerque  
4 to work on the hymn translation. Is that generally  
5 accurate?

6 A Generally, but when we lived out in the country,  
7 we had to haul our water for washing and it was no good to  
8 shower in. So we couldn't live out there.

9 Q When you first moved out to the property in the  
10 1970's, what was the water quality like at that time?

11 A Oh, it was excellent.

12 Q Were you able to wash clothes using the water?

13 A Oh, absolutely.

14 Q At what point did you begin to notice a  
15 deterioration in the water quality?

16 A It was like in around the year approximately 1981,  
17 '82, someplace in there, I noticed there was a greasy film  
18 on the water. We didn't cook with it, didn't think it  
19 could clean anything. It just wasn't good for drinking or  
20 -- Even washing the clothes, I was afraid it would ruin  
21 the clothes.

22 Q You mentioned a greasy film on the water. Were  
23 there any other characteristics of the water that you began  
24 to notice?

25 A Well, it wasn't clean water, didn't look clean.

26 Q What did it look like?

27 A It wasn't clear water.  
28

1 Q Was it mulky or murky?

2 A I would say so, but not really, really a dark  
3 color or anything, but it ruined, um, the bathtub, the  
4 toilet, you know, discolored from it.

5 Q Some of the folks we've talked to have described  
6 the water as having an orangish color. Was that your  
7 experience?

8 A I don't remember seeing orange.

9 Q How about the smell? Did the water ever develop  
10 any particular smell?

11 A Smell, yeah. It had a smell to it.

12 Q What did it smell like?

13 A I couldn't describe the smell. It wasn't really  
14 strong. It wasn't really strong, but it did have a  
15 different odor to it.

16 Q Was it a rotten egg smell?

17 A I guess you could say it was.

18 Q You mentioned that you began to observe these  
19 conditions in 1981. Had they been developing for some time  
20 before that, if you know?

21 A That's when I first noticed it.

22 Q And then how did the water quality change from  
23 1981 through, ah -----

24 A Got worse.

25 Q How did it get worse?

26 A By -- I noticed it was ruining the bathtub and the  
27 toilet, and so we just didn't use it after that.

28

1           Q     Was there a time when you were hauling water from  
2 other locations for drinking purposes?

3           A     Yes, we hauled water all the time.

4           Q     Where did you get the water?

5           A     There was a spring located on the west side of  
6 Poplar river, and we used to take the gallon jugs over  
7 there, maybe twenty of them at a time, and fill them up and  
8 bring them back.

9           Q     And if you can recall, about how long did you do  
10 that? Was it a matter of months, years, do you recall?

11          A     Did it all the time.

12          Q     And was that true after you began to detect these  
13 problems in 1981?

14          A     Yes.

15          Q     One of the things we've been told is that you've  
16 incurred some out of pocket expense for rent?

17          A     Yes.

18          Q     Paying rent for accommodations?

19          A     Um, yes.

20          Q     And we've been given -- well, first of all, what  
21 rent do you pay currently?

22          A     Currently, my share, about \$205 for rent, plus  
23 utilities, which run about \$140 a month.

24          Q     How long have you been paying \$205 a month as your  
25 share?

26          A     I think we've been out there about a year, out to  
27 the Airport Addition.

28

1 Q And that's living with your daughter?

2 A Yes.

3 Q And before that you told me where you were  
4 residing, but do you recall about what you were paying in  
5 rent when you moved back to the Poplar/Wolf Point area from  
6 Albuquerque?

7 A You mean when I lived in Wolf Point?

8 Q Yeah, let's start -----

9 A At Wolf Point, gosh -- we lived in a trailer  
10 house, and I believe the rent must have been \$300 a month.

11 Q And I think that there was an intermediate place  
12 you stayed between Wolf Point and living with your  
13 daughter?

14 A Yes, at City housing, the rent started at, I  
15 think, \$320 a month; and when I left there, I was paying  
16 \$370, somewhere around there.

17 Q And that leaves the years in Albuquerque. What  
18 accommodations did you have when you were living in  
19 Albuquerque?

20 A In Albuquerque, I lived in an apartment close to  
21 where I worked, and the rent there was \$500 a month. That  
22 included utilities, water.

23 Q We've also been told that you incurred expense  
24 hauling water for a period of three years, twenty gallons  
25 a week for a period of three years. Can you shed any light  
26 on what that may relate to?

27 A Hauling from town.

28

1           Q     We've just been told you incurred expense of a  
2 dollar a gallon, 20 gallons a week for a three year period.

3           A     From town, um-hm.

4           Q     From town to the country residence, is that  
5 accurate?

6           A     Yes.

7           Q     And during what three year period do you think  
8 that would be? Was that after you moved back to the  
9 country when your kids had graduated from high school, most  
10 likely?

11          A     I believe it was during that time. That spring  
12 they told us that it was contaminated where we were getting  
13 the water. They told us that it was contaminated; and so  
14 I didn't check it out or anything, but I just bought water  
15 from town.

16          Q     You say they told us it was contaminated.

17          A     People that go out there to use -- to get the  
18 water.

19          Q     From the spring?

20          A     A lot of people from Poplar were going out there  
21 to get water.

22          Q     So for a time you had been getting water from ----

23          A     The spring.

24          Q     --- the spring; and, I take it, you didn't have to  
25 pay for that water?

26          A     That's right.

27          Q     And at some point you decided to buy water in town  
28

1 instead?

2 A After they said it wasn't any good.

3 Q And they were referring to the spring water?

4 A Yes.

5 Q I see. So then for a period of about three years,  
6 you may have purchased water rather than going to the  
7 spring to get water?

8 A Yes.

9 Q And where did you purchase the water?

10 A The store, bought it by the gallon.

11 Q Grocery store in Poplar?

12 A Yes.

13 Q Was any use made of the six acre tract surrounding  
14 the house during the period when you were able to live out  
15 there? Was it used?

16 A Farmland.

17 Q Who farmed it?

18 A Dunn O'Connor.

19 Q Did he lease the acreage?

20 A He leased all the land surrounding where I lived.

21 Q Including that six acres?

22 A Not my land.

23 Q So the six acres that was a part of your land, was  
24 that ever used for any agricultural -----

25 A No. Before I moved out there, it was.

26 Q But after you moved out there, it was not?

27 A That's right.

28

1 Q Has that been true through the present?

2 A Yes.

3 Q Did you ever maintain any livestock?

4 A No.

5 Q When you began to notice a deterioration in the  
6 water quality and later left the country residence, did  
7 you, at that time, have any discussions with any of the oil  
8 companies that operated in the area?

9 A No.

10 Q Did you at that time suspect, at least, that the  
11 oil field activities may have been contributing to the  
12 decline of water quality?

13 A I thought that was probably the problem because  
14 this oil well was located not too far from where I live.

15 Q Do you know which oil well that was?

16 A Buckles.

17 Q How did you know that there was a Buckles well  
18 located not far from where you lived? You could see it, I  
19 take it.

20 A We could see it.

21 Q And how did you know it had the name Buckles?

22 A People talk.

23 Q Somebody told you that?

24 A Yes.

25 Q And what was it about the Buckles well or the oil  
26 field activities that caused you to think -- to suspect  
27 that was the source, possibly, of water quality problems?

28

1           A     It wasn't there very long, and they shut it down.

2           Q     What do you mean by that?

3           A     Well, we seen the oil well there at night because  
4     it was lit up; and then I don't know how long it was -- I  
5     didn't pay too much attention -- and then I don't know if  
6     they said it went dry or what. But it -- they took the rig  
7     down. It wasn't there. I should have been keeping a  
8     journal.

9           Q     We all say that from time to time. Did you notice  
10    any change or improvement in the water quality after that  
11    well shut down, if it did shut down?

12          A     No.

13          Q     Anything else about the oil field activities that  
14    caused you to have suspicions at least that they may have  
15    been a source of contamination, that you can think of?

16          A     No, that was my only thought. It had to be the  
17    well, I mean, the oil well, that caused the water to go  
18    bad; plus they always have seismograph crews going out and  
19    blasting, and I thought that maybe that had something to do  
20    with it, too.

21          Q     And those were thoughts that you formed when you  
22    began to notice this deterioration in water quality back in  
23    the early, mid 1980's, I take it?

24          A     Yes.

25          Q     While you were living in Poplar and later living  
26    in Albuquerque, I take it, you weren't at the property  
27    using the water on a frequent basis?

28

1           A     No.

2           Q     Have you noticed any physical -- are you claiming  
3 any physical effects from water on the property?

4           A     No.

5           Q     So far as you can recall, have you ever had any  
6 discussions with anyone from either Grace Petroleum or  
7 Samson Hydrocarbons?

8           A     No.

9     MR. STERUP: I think that's all I have at this time. Thank  
10 you.

11     EXAMINATION BY MR. WEBSTER:

12           Q     Abigail, my name is Mike Webster, and I represent  
13 Murphy Exploration in this matter. Have you had any  
14 discussions with any of the Murphy personnel?

15           A     No.

16           Q     Do you know Ray Reede?

17           A     Yes, I do.

18           Q     But you've never spoken with him about water  
19 issues?

20           A     No.

21           Q     And no other employees of Murphy that you've  
22 talked to?

23           A     No.

24           Q     Okay. Were you around the property, Abigail, when  
25 they began to do the -- when the USGS was out doing it's  
26 studies of the property? Did you know that they were out  
27 testing water and stuff?  
28

1 A The water?

2 Q Um-hm.

3 A On two occasions, there was a girl from Helena  
4 that came out testing water.

5 Q Joanna Thamke, is that her name?

6 A I believe that's her name.

7 Q Did you have an opportunity to visit with her at  
8 all while she was out doing her testing?

9 A No.

10 Q Did you ever visit with anyone at the Indian  
11 Health Service about your water quality on your property?

12 A No.

13 Q Did you ever have a chance to or an opportunity to  
14 visit with Deb Madison about your water?

15 A No.

16 Q How about anyone else from any other Tribal agency  
17 or Tribal -- well, agency, I guess?

18 A No. The IHS center were the ones that dug my  
19 water well.

20 Q And that was back in 1977, is that right?

21 A Yes.

22 Q Did you ever have any -- you always had plenty of  
23 water?

24 A Yes.

25 Q The quantity never deteriorated, it was just the  
26 quality of the water?

27 A Yes.

28

1 Q Do you remember about -- and I think you probably  
2 answered this, but I didn't write it down. Do you remember  
3 about when it was that you quit drinking water out there?

4 A About 1981.

5 Q Prior to 1981, you used the water for all purposes  
6 out there?

7 A Yes.

8 Q Do you have a septic system at that -- at your  
9 home or out on that property?

10 A I had a septic system and it didn't work. It  
11 collapsed. And so they built a lagoon.

12 Q When you say it didn't work and it collapsed, do  
13 you remember when that septic system collapsed or quit  
14 working?

15 A No, I don't.

16 Q Was it before your -- before 1981 or whatever?

17 A I believe so.

18 Q And then you say that they built a sewage lagoon.

19 A A lagoon.

20 Q Who is the they?

21 A Indian Health Service.

22 Q And where was the -- in relation to the -- well,  
23 let me back up. Where your home is located, can you tell  
24 me about in what direction and how many feet away your  
25 water well is from your home?

26 A My water well is east of the house about 40 feet.

27 Q Okay. Do you recall where the septic system was  
28

1 at your home?

2 A It was southeast of the house and maybe 40 feet.

3 Q So the well was to the east of the home, and the  
4 septic system was to the southeast of the home?

5 A Yes.

6 Q Where was the sewage lagoon in relation to where  
7 your homesite was?

8 A They built it north of the house.

9 Q How large or what did this lagoon look like? Can  
10 you describe it?

11 A Probably square like that wall. I don't know how  
12 many feet that is.

13 Q I don't either, but we'll say 25 feet. And was  
14 it an uncovered lagoon?

15 A Yes.

16 Q Do you know whether it was lined? whether the  
17 lagoon had any kind of a lining that was put into it or was  
18 it a kind of lagoon where water could sink down into the  
19 ground?

20 A I don't know how they build the lagoons.

21 Q You didn't observe them build it?

22 A No.

23 Q After the sewage lagoon was built, did you ever  
24 have any more trouble then with your sewage system or  
25 whatever?

26 A No.

27 Q Do you know what has happened to that lagoon since  
28

1 you've moved and no longer live there? Is it still in  
2 place?

3 A It's still there.

4 Q Do you remember what you paid for the home that  
5 you moved onto the property?

6 A Yes.

7 Q How much was it?

8 A Total?

9 Q Yes.

10 A I believe it was \$11,000.

11 Q Does that include the transportation costs ----

12 A Yes.

13 Q --- and the costs to place it on the ----

14 A Yes.

15 Q --- foundation? Okay. Since you have moved back  
16 to the Poplar area after having been gone to Albuquerque,  
17 do you ever go out and stay at the house now?

18 A I was out there. I didn't stay out there, but I  
19 go out there and check on the house.

20 Q Since 1994, have you ever stayed out overnight at  
21 the property?

22 A I had this R.N. living there for one year; and  
23 then after that, I asked her to leave. And even though  
24 people want to rent it, I won't rent it out anymore.

25 Q So there are people who have asked you if they  
26 could rent the property?

27 A Yes.

28

1 Q And you've told them no?

2 A Yes.

3 Q And why have you told them no?

4 A Because she trashed my house.

5 Q Do you think other renters might treat your house  
6 better?

7 A I don't think I would trust anybody.

8 Q Okay. Do you ever go out there, though, and spend  
9 -- since your renter was there and trashed the home, have  
10 you been back out and have you stayed?

11 A Cleaned.

12 Q Pardon?

13 A To clean.

14 Q To clean. But not to stay there ----

15 A No.

16 Q --- and not to spend nights there, whatever?

17 A No.

18 Q When you cleaned the house, did you use the water  
19 that was at the home to clean with?

20 A No, mainly cleaning rugs, walls, but, just like,  
21 WD-40.

22 Q Does the water still work out there?

23 A It's shut off.

24 Q It's shut off?

25 A My electricity and everything is shut off.

26 MR. WEBSTER: I don't think I have anything else.

27 EXAMINATION BY MR. FAGAN:

28

1 Q Abigail, my name is Gerry Fagan. I represent  
2 Marathon Oil. Have you ever talked with any Marathon Oil  
3 employees?

4 A No.

5 Q Or Texas Oil and Gas employee?

6 A No.

7 Q Have you heard of their wells at all?

8 A No.

9 Q Have you ever heard that there's been benzene  
10 found in your well?

11 A I just heard that a few days ago.

12 Q From who?

13 A From Mr. Dolan.

14 Q Mr. Dolan?

15 A Yes.

16 Q Have you seen your reports about that?

17 A I've looked at them.

18 Q Which reports were those, do you recall?

19 A They were mailed to me, those reports.

20 Q By Mr. Dolan?

21 A Yes.

22 Q Concerning the Buckles well, was it your testimony  
23 that you think that it may have caused the water quality to  
24 deteriorate on your property?

25 A That's my belief.

26 Q And why was that again? Why did you believe that?

27 A Because it was so close.  
28

1 Q Just because of the location and the timing?

2 A Yes.

3 Q Have you ever heard anything about the way that  
4 well was operated?

5 A No.

6 Q Did you ever see that well?

7 A I seen it.

8 Q Did you drive by it?

9 A Yes.

10 Q How did it look to you?

11 A Well, we just drove by it at night to see the  
12 lights, you know; and after that, well, we never drove by  
13 there anymore.

14 Q You couldn't really tell anything from driving by  
15 other than it was brightly lit. So, basically, your idea  
16 that the Buckles well may have caused it is based on when  
17 it went in there and it was near?

18 A Yes.

19 MR. FAGAN: I have no further questions. Thanks.

20 EXAMINATION BY MR. ROSS:

21 Q My name is John Ross, and I represent Pioneer  
22 Natural Resources, which succeeded to the interest of Mesa  
23 Petroleum in the well that they had in East Poplar oil  
24 field. Other than the Buckles well, are you familiar with  
25 the location or names of any other wells in the East Poplar  
26 oil field?

27 A The names? No.

28

1 MR. ROSS: I have no further questions. Thank you.

2 (THERE BEING NO FURTHER QUESTIONS, THIS DEPOSITION WAS THEN  
3 CONCLUDED AT 1:10 P.M.)

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CERTIFICATE

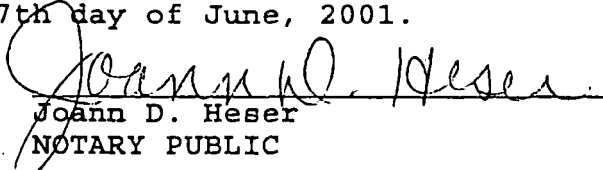
STATE OF MONTANA                    )  
  :    ss.  
COUNTY OF ROOSEVELT                )

I, JOANN D. HESER, Official Court Reporter, Fifteenth Judicial District, and a Notary Public duly qualified in and for the State of Montana, hereby certify there came before me the deponent herein, namely ABIGAIL REDDOOR, who was by me duly sworn to testify to the truth and nothing but the truth concerning the matters in this cause.

I further certify that I was the Official Court Reporter who reported, by means of LANIER recorder, this deposition. The testimony therein and other proceedings herein contained are a true and correct transcription of the original tapes and my notes, TO THE BEST OF MY ABILITY.

I further certify that I am not related in any manner to any party, witness, or counsel and have no financial or other interest in the outcome of the above entitled cause.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my Notarial Seal this 27th day of June, 2001.

  
Joann D. Heser  
NOTARY PUBLIC

My Comm. exp. 7/2/2004

DEPONENT'S CERTIFICATE

I, ABIGAIL REDDOOR, do hereby certify that I have read the foregoing transcript of my testimony and that the same is a full, true and correct record of my deposition except as to any corrections I have listed on the Corrections to Deposition form.

\_\_\_\_\_ Changes and corrections made.

\_\_\_\_\_ No changes or corrections made.

\_\_\_\_\_  
ABIGAIL REDDOOR

Subscribed and sworn to before me this \_\_\_\_\_ day of \_\_\_\_\_, 2001.

\_\_\_\_\_  
NOTARY PUBLIC for the State of Montana  
Residing at \_\_\_\_\_, Montana  
My Commission expires \_\_\_\_\_

CORRECTIONS TO DEPOSITION

The Deponent, ABIGAIL REDDOOR, states she wishes to make the following changes in testimony as originally sworn:

[illegible]

ABIGAIL REDDOOR



IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BILLINGS DIVISION

CARY G. YOUNG, et al.,

Plaintiffs,

vs.

MURPHY OIL USA, INC., et al.,

Defendants.

Cause No. CV 98-108-BLG-JDS

Judge Jack D. Shanstrom

MESA PETROLEUM and PIONEER  
NATURAL RESOURCES, USA, INC.,

Defendants/

Third Party Plaintiffs &  
Cross Plaintiffs,

vs.

AMARCO RESOURCES CORP.  
BESTWAY INC.; WESTDALE  
PETROLEUM INC.; and THE  
PRUDENTIAL GROUP,

Third Party Defendants,

vs.

JOHN DOES 4-50,

Cross-Defendants.

TIME: Tuesday, June 12, 2001 at 12:34 p.m.

PLACE: Sherman Motor Inn, 200 East Main, Wolf Point, MT

DEPOSITION

OF

ABIGAIL REDDOOR

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ALSO PRESENT:

Ima Reddoor

Page 4

BE IT REMEMBERED: That the oral deposition of ABIGAIL REDDOOR was taken at 12:34 p.m. on the 12th day of June, 2001 at the Sherman Motor Inn, 200 East Main, Wolf Point, Montana, with the appearances of counsel hereinbefore noted, before Joann D. Heser, Official Court Reporter and Notary Public for the State of Montana.

The following proceedings were had:

Whereupon,

ABIGAIL REDDOOR,

called for examination, and being first duly sworn upon her oath, testified as follows:

EXAMINATION BY MR. STERUP:

Q Will you state your name for the record?

A Abigail Yvonne Reddoor.

Q My name is Rob Sterup. I'm representing Samson Hydrocarbons. Have you ever been to a deposition before?

A No.

Q Has the process been explained to you?

A Yes.

Q We will be asking questions as you know, and your answers will be recorded and later transcribed, so it's important that you respond audibly so the answers can be taken down and also important that you wait until I finish the question before beginning your answers. What is your occupation or employment?

A I'm a teacher at Poplar Public School.

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Page 7

1 Q What do you teach?  
 2 A Dakota language.  
 3 Q How long have you had that employment?  
 4 A Six years.  
 5 Q What employment did you have before that?  
 6 A Um, medical transcriber, medical secretary,  
 7 medical technician for Public Health Service.  
 8 Q How long did you work for the Public Health  
 9 Service?  
 10 A Seventeen years.  
 11 Q What is your educational background?  
 12 A I have an Associate of Arts degree in business  
 13 administration.  
 14 Q What college or university did you attend?  
 15 A I went to Fort Peck Community College, Poplar,  
 16 Montana.  
 17 Q Where are you from originally?  
 18 A Poplar, Montana.  
 19 Q What is your age and date of birth?  
 20 A My age 63, my birthdate 9/26/37.  
 21 Q Have you ever lived outside the Poplar area for  
 22 any significant period of time?  
 23 A Yes, I lived in San Jose, California, in -- I  
 24 moved there in 1967, and I was there for seven years. I  
 25 lived in Albuquerque, New Mexico, for four years. And I've  
 26 been in Poplar the rest.  
 27 Q What years did you live in Albuquerque?  
 28

1 that you inherited the property from your grandfather?  
 2 A (By Deponent) My grandfather, Basil Reddoor.  
 3 Q And do you recall about when you inherited the  
 4 property?  
 5 A Well, I found out about it in 1973, and then I  
 6 bought a house in Scobey, Montana, and I had it moved onto  
 7 that property.  
 8 Q The information I have indicates that you had  
 9 about twelve acres at that particular site. Is that an  
 10 accurate account?  
 11 A Yes.  
 12 Q And, apparently, you learned of your inheritance  
 13 of that acreage in about 1973?  
 14 A Um-hm. (Indicates yes.)  
 15 Q And one of the things you need to do is to speak  
 16 up audibly with your answers, a yes or a no. And about  
 17 when did you then move onto that property?  
 18 A 1976.  
 19 Q And at that time, apparently, you caused a house  
 20 to be moved onto the property?  
 21 A Yes.  
 22 Q Who was living with you at that time?  
 23 A My family.  
 24 Q Who was in your family?  
 25 A My husband, my two daughters and one son.  
 26 Q What were their names?  
 27 A My oldest daughter is Lanette Ryan. My second  
 28

Page 6

Page 8

1 A In 1990 through '94.  
 2 Q What is your relationship to Irma Reddoor?  
 3 A Irma Reddoor is my sister.  
 4 Q Are you related to any of the other plaintiffs in  
 5 this litigation?  
 6 A No.  
 7 Q How long has your family lived in the Poplar area?  
 8 A My family? Lifetime.  
 9 Q So your parents were from Poplar and their parents  
 10 before them, going back quite a ways, I take it?  
 11 A Um-hm. (Indicates yes.)  
 12 Q One of the exhibits that you should have in front  
 13 of you is a large map. The information that I have  
 14 indicates that the property that we're concerned with today  
 15 is one that has a water well on it denominated M18. Can  
 16 you find M18 on the large map which I believe is Exhibit  
 17 No. 1? Have you been able to locate that on the Exhibit?  
 18 A Yes.  
 19 Q The property surrounding M18, when did you first  
 20 acquire any interest in that particular property, in what  
 21 year?  
 22 A The property that I lived on? Okay. I was given  
 23 this land by my grandfather in a will, and I moved a house  
 24 on that property in, I believe, 19 ----  
 25 (A BRIEF INTERRUPTION.)  
 26 Q (By Mr. Sterup) Let's go back on the record. We  
 27 had a brief unexpected interruption there. You were saying  
 28

1 daughter is Gina Ryan. My son, Eugene Ryan, Jr.  
 2 Q How long did you continue to live on that  
 3 property?  
 4 A I believe in 1981 I moved into town into  
 5 government housing because my children were all involved in  
 6 sports.  
 7 Q How old were your children at that time?  
 8 A They were all in high school, 15, 17, 18.  
 9 Q And, I take it, as children tend to do these days,  
 10 they had a pretty full schedule with the sports and other  
 11 activities?  
 12 A Yes.  
 13 Q And to accommodate that, you thought it would be  
 14 better to live in town rather than out in the country?  
 15 A Yes.  
 16 Q And as far as you can recollect, that was about  
 17 1981?  
 18 A Yes.  
 19 Q And where did you move in Poplar, at what  
 20 location?  
 21 A Government housing. It was located a block south  
 22 of the Indian Health Center.  
 23 Q How long did you stay at that particular  
 24 residence?  
 25 A Approximately two years.  
 26 Q Where did you go at that point?  
 27 A I believe I moved back out to the country.  
 28

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1 Q So that puts us up to about 1983 when you moved  
2 back out to the country, is that accurate?  
3 A Yes, um-hm.  
4 Q Had anyone occupied the house in the country  
5 during that two year period about 1981 to about 1983?  
6 A We went back out to the house off and on, stay out  
7 there on weekends and so forth.  
8 Q So your primary residence was in town, but you  
9 continued to go back out to the country from time to time?  
10 Is that accurate?  
11 A Um-hm. Yes, it is.  
12 Q And then after moving back out to the country in  
13 1983, how long did you continue to maintain that residence?  
14 A No, it was 1985 -- up until 1985 I was in town.  
15 Q So you moved into town to accommodate your kids'  
16 schedules in about 1981 and you stayed in town until about  
17 1985?  
18 A Yeah. Yes, that's when my son graduated from high  
19 school.  
20 Q And at that point, 1985, your children had all  
21 left school, I take it?  
22 A Yes.  
23 Q And at that point, did you and your husband move  
24 back out to the country or did you go somewhere else?  
25 A I moved back out to the country.  
26 Q And in 1985 after having moved back out to the  
27 country, how long did you stay at that residence before you  
28

1 that we attended, the person that worked in the music  
2 department; and so it didn't cost us a thing in money at  
3 all to get those hymns recorded. And there was an  
4 agreement that when we accomplished this, they would have  
5 the master copy of the music.  
6 Q Is the language that you teach, Lakota or Dakota?  
7 A Dakota.  
8 Q How did you learn the Dakota language?  
9 A I can't tell you that exactly because when I lived  
10 in South Dakota I was five years old and that's where I  
11 knew the language, playing with the kids. I just know.  
12 Q Have you continued to use it throughout your adult  
13 life?  
14 A Yes.  
15 Q What percentage of the Fort Peck Tribe is fluent  
16 in Dakota, a large or small percentage?  
17 A Small percentage. There are only about, oh,  
18 approximately 60 fluent speakers.  
19 Q The move to Albuquerque for the purpose of  
20 translating the hymns in 1990, it took a bit longer than  
21 you anticipated. When did you then move back to the Poplar  
22 area?  
23 A June 1994.  
24 Q Have any of your children lived with you in your  
25 home since they graduated from high school in the late  
26 1980's? Have they all been out on their own?  
27 A They've all been on their own.  
28

Page 10

Page 12

1 moved somewhere else?  
2 A Up until, I believe, 1990, because I was going to  
3 community college at the time.  
4 Q So between 1985 and 1990, you were attending  
5 community college?  
6 A I graduated there in, must have been '87--'88. I  
7 don't remember exactly.  
8 Q And then in 1990, where did you move?  
9 A From there, I moved to Albuquerque, New Mexico.  
10 Q How does it happen you moved to Albuquerque in  
11 1990?  
12 A I was trying to find a way to get our Dakota hymns  
13 translated and recorded, and so I moved to Albuquerque and  
14 accomplished that through the University of New Mexico.  
15 Q Did you have employment at the University?  
16 A No, I didn't. I was employed by Lovelace Medical  
17 Center as a medical transcriptionist all during the time I  
18 was there.  
19 Q But it sounds like the primary driving force  
20 behind the move to Albuquerque was your desire to work at  
21 the University on translating the hymns?  
22 A I didn't think it would take four years, but it  
23 did.  
24 Q I'm just curious. What resource do they have at  
25 the University that aided you in that project?  
26 A It was set up through our Presbyterian Church that  
27 we attended there. They belong to the Presbyterian Church  
28

1 Q Since moving back to Poplar from Albuquerque,  
2 where have you lived?  
3 A First year I came back, I lived here in Wolf Point  
4 for a year, commuted to work in Poplar; and then I moved  
5 back into Poplar and lived in city housing for, I believe,  
6 three years -- three, four years -- three years, I believe.  
7 And now I reside with my daughter in Fort Peck Housing.  
8 Q What became of the house that you had moved out to  
9 the country location?  
10 A It's still there.  
11 Q Has it been occupied since you moved to  
12 Albuquerque in 1990?  
13 A I rented it to some people for one year, but they  
14 didn't take care of it so I don't rent it to anybody.  
15 Q Who were those folks?  
16 A She was a registered nurse at the community  
17 hospital, but I don't recall her name.  
18 Q And when you say they didn't take care of it, I  
19 take it you mean simple upkeep and maintenance and that  
20 sort of thing?  
21 A Yes.  
22 Q So since they left in about 1991, the house has  
23 been there but it's not been occupied or rented to anyone?  
24 A Yes.  
25 Q Is that accurate?  
26 A That's right.  
27 Q So just so I understand correctly, the first time  
28

Page 13

Page 15

1 you moved off of the country away from the country house  
2 into town, it was because of your kids' school activities;  
3 and the second time you moved off was to go to Albuquerque  
4 to work on the hymn translation. Is that generally  
5 accurate?

6 A Generally, but when we lived out in the country,  
7 we had to haul our water for washing and it was no good to  
8 shower in. So we couldn't live out there.

9 Q When you first moved out to the property in the  
10 1970's, what was the water quality like at that time?

11 A Oh, it was excellent.

12 Q Were you able to wash clothes using the water?

13 A Oh, absolutely.

14 Q At what point did you begin to notice a  
15 deterioration in the water quality?

16 A It was like in around the year approximately 1981,  
17 '82, someplace in there, I noticed there was a greasy film  
18 on the water. We didn't cook with it, didn't think it  
19 could clean anything. It just wasn't good for drinking or  
20 -- Even washing the clothes, I was afraid it would ruin  
21 the clothes.

22 Q You mentioned a greasy film on the water. Were  
23 there any other characteristics of the water that you began  
24 to notice?

25 A Well, it wasn't clean water, didn't look clean.

26 Q What did it look like?

27 A It wasn't clear water.

28

1 Q Was there a time when you were hauling water from  
2 other locations for drinking purposes?

3 A Yes, we hauled water all the time.

4 Q Where did you get the water?

5 A There was a spring located on the west side of  
6 Poplar river, and we used to take the gallon jugs over  
7 there, maybe twenty of them at a time, and fill them up and  
8 bring them back.

9 Q And if you can recall, about how long did you do  
10 that? Was it a matter of months, years, do you recall?

11 A Did it all the time.

12 Q And was that true after you began to detect these  
13 problems in 1981?

14 A Yes.

15 Q One of the things we've been told is that you've  
16 incurred some out of pocket expense for rent?

17 A Yes.

18 Q Paying rent for accommodations?

19 A Um, yes.

20 Q And we've been given -- well, first of all, what  
21 rent do you pay currently?

22 A Currently, my share, about \$205 for rent, plus  
23 utilities, which run about \$140 a month.

24 Q How long have you been paying \$205 a month as your  
25 share?

26 A I think we've been out there about a year, out to  
27 the Airport Addition.

28

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Page 16

1 Q Was it mulky or murky?

2 A I would say so, but not really, really a dark  
3 color or anything, but it ruined, um, the bathtub, the  
4 toilet, you know, discolored from it.

5 Q Some of the folks we've talked to have described  
6 the water as having an orangish color. Was that your  
7 experience?

8 A I don't remember seeing orange.

9 Q How about the smell? Did the water ever develop  
10 any particular smell?

11 A Smell, yeah. It had a smell to it.

12 Q What did it smell like?

13 A I couldn't describe the smell. It wasn't really  
14 strong. It wasn't really strong, but it did have a  
15 different odor to it.

16 Q Was it a rotten egg smell?

17 A I guess you could say it was.

18 Q You mentioned that you began to observe these  
19 conditions in 1981. Had they been developing for some time  
20 before that, if you know?

21 A That's when I first noticed it.

22 Q And then how did the water quality change from  
23 1981 through, ah ----

24 A Got worse.

25 Q How did it get worse?

26 A By -- I noticed it was ruining the bathtub and the  
27 toilet, and so we just didn't use it after that.

28

1 Q And that's living with your daughter?

2 A Yes.

3 Q And before that you told me where you were  
4 residing, but do you recall about what you were paying in  
5 rent when you moved back to the Poplar/Wolf Point area from  
6 Albuquerque?

7 A You mean when I lived in Wolf Point?

8 Q Yeah, let's start ----

9 A At Wolf Point, gosh -- we lived in a trailer  
10 house, and I believe the rent must have been \$300 a month.

11 Q And I think that there was an intermediate place  
12 you stayed between Wolf Point and living with your  
13 daughter?

14 A Yes, at City housing, the rent started at, I  
15 think, \$320 a month; and when I left there, I was paying  
16 \$370, somewhere around there.

17 Q And that leaves the years in Albuquerque. What  
18 accommodations did you have when you were living in  
19 Albuquerque?

20 A In Albuquerque, I lived in an apartment close to  
21 where I worked, and the rent there was \$500 a month. That  
22 included utilities, water.

23 Q We've also been told that you incurred expense  
24 hauling water for a period of three years, twenty gallons  
25 a week for a period of three years. Can you shed any light  
26 on what that may relate to?

27 A Hauling from town.

28

Page 17

Page 19

1 Q We've just been told you incurred expense of a  
 2 dollar a gallon, 20 gallons a week for a three year period.  
 3 A From town, um-hm.  
 4 Q From town to the country residence, is that  
 5 accurate?  
 6 A Yes.  
 7 Q And during what three year period do you think  
 8 that would be? Was that after you moved back to the  
 9 country when your kids had graduated from high school, most  
 10 likely?  
 11 A I believe it was during that time. That spring  
 12 they told us that it was contaminated where we were getting  
 13 the water. They told us that it was contaminated; and so  
 14 I didn't check it out or anything, but I just bought water  
 15 from town.  
 16 Q You say they told us it was contaminated.  
 17 A People that go out there to use -- to get the  
 18 water.  
 19 Q From the spring?  
 20 A A lot of people from Poplar were going out there  
 21 to get water.  
 22 Q So for a time you had been getting water from ----  
 23 A The spring.  
 24 Q --- the spring; and, I take it, you didn't have to  
 25 pay for that water?  
 26 A That's right.  
 27 Q And at some point you decided to buy water in town  
 28

1 Q Has that been true through the present?  
 2 A Yes.  
 3 Q Did you ever maintain any livestock?  
 4 A No.  
 5 Q When you began to notice a deterioration in the  
 6 water quality and later left the country residence, did  
 7 you, at that time, have any discussions with any of the oil  
 8 companies that operated in the area?  
 9 A No.  
 10 Q Did you at that time suspect, at least, that the  
 11 oil field activities may have been contributing to the  
 12 decline of water quality?  
 13 A I thought that was probably the problem because  
 14 this oil well was located not too far from where I live.  
 15 Q Do you know which oil well that was?  
 16 A Buckles.  
 17 Q How did you know that there was a Buckles well  
 18 located not far from where you lived? You could see it, I  
 19 take it.  
 20 A We could see it.  
 21 Q And how did you know it had the name Buckles?  
 22 A People talk.  
 23 Q Somebody told you that?  
 24 A Yes.  
 25 Q And what was it about the Buckles well or the oil  
 26 field activities that caused you to think -- to suspect  
 27 that was the source, possibly, of water quality problems?  
 28

Page 18

Page 20

1 instead?  
 2 A After they said it wasn't any good.  
 3 Q And they were referring to the spring water?  
 4 A Yes.  
 5 Q I see. So then for a period of about three years,  
 6 you may have purchased water rather than going to the  
 7 spring to get water?  
 8 A Yes.  
 9 Q And where did you purchase the water?  
 10 A The store, bought it by the gallon.  
 11 Q Grocery store in Poplar?  
 12 A Yes.  
 13 Q Was any use made of the six acre tract surrounding  
 14 the house during the period when you were able to live out  
 15 there? Was it used?  
 16 A Farmland.  
 17 Q Who farmed it?  
 18 A Dunn O'Connor.  
 19 Q Did he lease the acreage?  
 20 A He leased all the land surrounding where I lived.  
 21 Q Including that six acres?  
 22 A Not my land.  
 23 Q So the six acres that was a part of your land, was  
 24 that ever used for any agricultural ----  
 25 A No. Before I moved out there, it was.  
 26 Q But after you moved out there, it was not?  
 27 A That's right.  
 28

1 A It wasn't there very long, and they shut it down.  
 2 Q What do you mean by that?  
 3 A Well, we seen the oil well there at night because  
 4 it was lit up; and then I don't know how long it was -- I  
 5 didn't pay too much attention -- and then I don't know if  
 6 they said it went dry or what. But it -- they took the rig  
 7 down. It wasn't there. I should have been keeping a  
 8 journal.  
 9 Q We all say that from time to time. Did you notice  
 10 any change or improvement in the water quality after that  
 11 well shut down, if it did shut down?  
 12 A No.  
 13 Q Anything else about the oil field activities that  
 14 caused you to have suspicions at least that they may have  
 15 been a source of contamination, that you can think of?  
 16 A No, that was my only thought. It had to be the  
 17 well, I mean, the oil well, that caused the water to go  
 18 bad; plus they always have seismograph crews going out and  
 19 blasting, and I thought that maybe that had something to do  
 20 with it, too.  
 21 Q And those were thoughts that you formed when you  
 22 began to notice this deterioration in water quality back in  
 23 the early, mid 1980's, I take it?  
 24 A Yes.  
 25 Q While you were living in Poplar and later living  
 26 in Albuquerque, I take it, you weren't at the property  
 27 using the water on a frequent basis?  
 28

Page 21

Page 23

1 A No.  
 2 Q Have you noticed any physical -- are you claiming  
 3 any physical effects from water on the property?  
 4 A No.  
 5 Q So far as you can recall, have you ever had any  
 6 discussions with anyone from either Grace Petroleum or  
 7 Samson Hydrocarbons?  
 8 A No.  
 9 MR. STERUP: I think that's all I have at this time. Thank  
 10 you.  
 11 EXAMINATION BY MR. WEBSTER:  
 12 Q Abigail, my name is Mike Webster, and I represent  
 13 Murphy Exploration in this matter. Have you had any  
 14 discussions with any of the Murphy personnel?  
 15 A No.  
 16 Q Do you know Ray Reede?  
 17 A Yes, I do.  
 18 Q But you've never spoken with him about water  
 19 issues?  
 20 A No.  
 21 Q And no other employees of Murphy that you've  
 22 talked to?  
 23 A No.  
 24 Q Okay. Were you around the property, Abigail, when  
 25 they began to do the -- when the USGS was out doing it's  
 26 studies of the property? Did you know that they were out  
 27 testing water and stuff?  
 28

1 Q Do you remember about -- and I think you probably  
 2 answered this, but I didn't write it down. Do you remember  
 3 about when it was that you quit drinking water out there?  
 4 A About 1981.  
 5 Q Prior to 1981, you used the water for all purposes  
 6 out there?  
 7 A Yes.  
 8 Q Do you have a septic system at that -- at your  
 9 home or out on that property?  
 10 A I had a septic system and it didn't work. It  
 11 collapsed. And so they built a lagoon.  
 12 Q When you say it didn't work and it collapsed, do  
 13 you remember when that septic system collapsed or quit  
 14 working?  
 15 A No, I don't.  
 16 Q Was it before your -- before 1981 or whatever?  
 17 A I believe so.  
 18 Q And then you say that they built a sewage lagoon.  
 19 A A lagoon.  
 20 Q Who is the they?  
 21 A Indian Health Service.  
 22 Q And where was the -- in relation to the -- well,  
 23 let me back up. Where your home is located, can you tell  
 24 me about in what direction and how many feet away your  
 25 water well is from your home?  
 26 A My water well is east of the house about 40 feet.  
 27 Q Okay. Do you recall where the septic system was  
 28

Page 22

Page 24

1 A The water?  
 2 Q Um-hm.  
 3 A On two occasions, there was a girl from Helena  
 4 that came out testing water.  
 5 Q Joanna Thamke, is that her name?  
 6 A I believe that's her name.  
 7 Q Did you have an opportunity to visit with her at  
 8 all while she was out doing her testing?  
 9 A No.  
 10 Q Did you ever visit with anyone at the Indian  
 11 Health Service about your water quality on your property?  
 12 A No.  
 13 Q Did you ever have a chance to or an opportunity to  
 14 visit with Deb Madison about your water?  
 15 A No.  
 16 Q How about anyone else from any other Tribal agency  
 17 or Tribal -- well, agency, I guess?  
 18 A No. The IHS center were the ones that dug my  
 19 water well.  
 20 Q And that was back in 1977, is that right?  
 21 A Yes.  
 22 Q Did you ever have any -- you always had plenty of  
 23 water?  
 24 A Yes.  
 25 Q The quantity never deteriorated, it was just the  
 26 quality of the water?  
 27 A Yes.  
 28

1 at your home?  
 2 A It was southeast of the house and maybe 40 feet.  
 3 Q So the well was to the east of the home, and the  
 4 septic system was to the southeast of the home?  
 5 A Yes.  
 6 Q Where was the sewage lagoon in relation to where  
 7 your homesite was?  
 8 A They built it north of the house.  
 9 Q How large or what did this lagoon look like? Can  
 10 you describe it?  
 11 A Probably square like that wall. I don't know how  
 12 many feet that is.  
 13 Q I don't either, but we'll say 25 feet. And was  
 14 it an uncovered lagoon?  
 15 A Yes.  
 16 Q Do you know whether it was lined? whether the  
 17 lagoon had any kind of a lining that was put into it or was  
 18 it a kind of lagoon where water could sink down into the  
 19 ground?  
 20 A I don't know how they build the lagoons.  
 21 Q You didn't observe them build it?  
 22 A No.  
 23 Q After the sewage lagoon was built, did you ever  
 24 have any more trouble then with your sewage system or  
 25 whatever?  
 26 A No.  
 27 Q Do you know what has happened to that lagoon since  
 28

Page 25

1 you've moved and no longer live there? Is it still in  
 2 place?  
 3 A It's still there.  
 4 Q Do you remember what you paid for the home that  
 5 you moved onto the property?  
 6 A Yes.  
 7 Q How much was it?  
 8 A Total?  
 9 Q Yes.  
 10 A I believe it was \$11,000.  
 11 Q Does that include the transportation costs ----  
 12 A Yes.  
 13 Q --- and the costs to place it on the ----  
 14 A Yes.  
 15 Q --- foundation? Okay. Since you have moved back  
 16 to the Poplar area after having been gone to Albuquerque,  
 17 do you ever go out and stay at the house now?  
 18 A I was out there. I didn't stay out there, but I  
 19 go out there and check on the house.  
 20 Q Since 1994, have you ever stayed out overnight at  
 21 the property?  
 22 A I had this R.N. living there for one year; and  
 23 then after that, I asked her to leave. And even though  
 24 people want to rent it, I won't rent it out anymore.  
 25 Q So there are people who have asked you if they  
 26 could rent the property?  
 27 A Yes.  
 28

Page 26

1 Q And you've told them no?  
 2 A Yes.  
 3 Q And why have you told them no?  
 4 A Because she trashed my house.  
 5 Q Do you think other renters might treat your house  
 6 better?  
 7 A I don't think I would trust anybody.  
 8 Q Okay. Do you ever go out there, though, and spend  
 9 -- since your renter was there and trashed the home, have  
 10 you been back out and have you stayed?  
 11 A Cleaned.  
 12 Q Pardon?  
 13 A To clean.  
 14 Q To clean. But not to stay there ----  
 15 A No.  
 16 Q --- and not to spend nights there, whatever?  
 17 A No.  
 18 Q When you cleaned the house, did you use the water  
 19 that was at the home to clean with?  
 20 A No, mainly cleaning rugs, walls, but, just like,  
 21 WD-40.  
 22 Q Does the water still work out there?  
 23 A It's shut off.  
 24 Q It's shut off?  
 25 A My electricity and everything is shut off.  
 26 MR. WEBSTER: I don't think I have anything else.  
 27 EXAMINATION BY MR. FAGAN:  
 28

Page 27

1 Q Abigail, my name is Gerry Fagan. I represent  
 2 Marathon Oil. Have you ever talked with any Marathon Oil  
 3 employees?  
 4 A No.  
 5 Q Or Texas Oil and Gas employee?  
 6 A No.  
 7 Q Have you heard of their wells at all?  
 8 A No.  
 9 Q Have you ever heard that there's been benzene  
 10 found in your well?  
 11 A I just heard that a few days ago.  
 12 Q From who?  
 13 A From Mr. Dolan.  
 14 Q Mr. Dolan?  
 15 A Yes.  
 16 Q Have you seen your reports about that?  
 17 A I've looked at them.  
 18 Q Which reports were those, do you recall?  
 19 A They were mailed to me, those reports.  
 20 Q By Mr. Dolan?  
 21 A Yes.  
 22 Q Concerning the Buckles well, was it your testimony  
 23 that you think that it may have caused the water quality to  
 24 deteriorate on your property?  
 25 A That's my belief.  
 26 Q And why was that again? Why did you believe that?  
 27 A Because it was so close.  
 28

Page 28

1 Q Just because of the location and the timing?  
 2 A Yes.  
 3 Q Have you ever heard anything about the way that  
 4 well was operated?  
 5 A No.  
 6 Q Did you ever see that well?  
 7 A I seen it.  
 8 Q Did you drive by it?  
 9 A Yes.  
 10 Q How did it look to you?  
 11 A Well, we just drove by it at night to see the  
 12 lights, you know; and after that, well, we never drove by  
 13 there anymore.  
 14 Q You couldn't really tell anything from driving by  
 15 other than it was brightly lit. So, basically, your idea  
 16 that the Buckles well may have caused it is based on when  
 17 it went in there and it was near?  
 18 A Yes.  
 19 MR. FAGAN: I have no further questions. Thanks.  
 20 EXAMINATION BY MR. ROSS:  
 21 Q My name is John Ross, and I represent Pioneer  
 22 Natural Resources, which succeeded to the interest of Mesa  
 23 Petroleum in the well that they had in East Poplar oil  
 24 field. Other than the Buckles well, are you familiar with  
 25 the location or names of any other wells in the East Poplar  
 26 oil field?  
 27 A The names? No.  
 28

Page 29

1 MR. ROSS: I have no further questions. Thank you.  
 2 (THERE BEING NO FURTHER QUESTIONS, THIS DEPOSITION WAS THEN  
 3 CONCLUDED AT 1:10 P.M.)  
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DEPONENT'S CERTIFICATE

1 I, ABIGAIL REDDOOR, do hereby certify that I have read the  
 2 foregoing transcript of my testimony and that the same is a  
 3 full, true and correct record of my deposition except as to any  
 4 corrections I have listed on the Corrections to Deposition form.  
 5  
 6 \_\_\_\_\_ Changes and corrections made.  
 7 \_\_\_\_\_ No changes or corrections made.  
 8

ABIGAIL REDDOOR

9  
 10 Subscribed and sworn to before me this \_\_\_\_\_ day of  
 11 \_\_\_\_\_, 2001.  
 12

13 NOTARY PUBLIC for the State of Montana  
 14 Residing at \_\_\_\_\_, Montana  
 15 My Commission expires \_\_\_\_\_  
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CERTIFICATE

1 STATE OF MONTANA )  
 2 : ss.  
 3 COUNTY OF ROOSEVELT )  
 4 I, JOANN D. HESER, Official Court Reporter, Fifteenth  
 5 Judicial District, and a Notary Public duly qualified in and for  
 6 the State of Montana, hereby certify there came before me the  
 7 deponent herein, namely ABIGAIL REDDOOR, who was by me duly  
 8 sworn to testify to the truth and nothing but the truth  
 9 concerning the matters in this cause.  
 10 I further certify that I was the Official Court Reporter  
 11 who reported, by means of LANIER recorder, this deposition. The  
 12 testimony therein and other proceedings herein contained are a  
 13 true and correct transcription of the original tapes and my  
 14 notes, TO THE BEST OF MY ABILITY.  
 15 I further certify that I am not related in any manner to  
 16 any party, witness, or counsel and have no financial or other  
 17 interest in the outcome of the above entitled cause.  
 18 IN WITNESS WHEREOF, I have hereunto set my hand and affixed  
 19 my Notarial Seal this 27th day of June, 2001.  
 20

Joann D. Heser

NOTARY PUBLIC

My Comm. exp. 7/2/2004  
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CORRECTIONS TO DEPOSITION

1 The Deponent, ABIGAIL REDDOOR, states she wishes to make  
 2 the following changes in testimony as originally sworn:  
 3

PAGE	LINE	SHOULD READ	REASON
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ABIGAIL REDDOOR



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